

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Teresa Readnower,

Plaintiff,

vs.

General Ionics, Inc.,
c/o Prentice Hall Corp. System,

Defendant.

Case No. C-1-01-654

Judge Spiegel

AFFIDAVIT OF JAN E. HENSEL

STATE OF OHIO

:

:ss

COUNTY OF FRANKLIN

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I, Jan E. Hensel, having been duly cautioned and sworn, appear and state as follows:

1. I am of full legal age and competent to testify to the matters contained herein.
2. The matters contained herein are true and based upon my personal knowledge.
3. I am counsel for Defendant General Ionics in this matter.
4. As counsel for General Ionics, I drafted the responses to Plaintiff's

Interrogatories, including Interrogatory 6(a), and forwarded them to Julie Seger for review and verification.

5. Interrogatory 6(a) states, "Identify by name and job title all persons who played any role whatsoever in the decision to terminate Plaintiff." This Interrogatory is very broad and vague, and subject to differing interpretations.

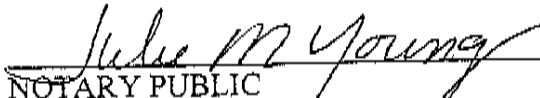
6. During conversations with Julie Seger prior to her deposition, and during her deposition, it became very clear that General Ionics had insulated Dan Goins from the

termination decision. Therefore, in an effort to avoid confusion, I decided to revise the previous answer to Interrogatory 6(a) to reflect the fact that Mr. Goins was not involved in the termination decision. Unfortunately, however, I erroneously served a revised answer to Interrogatory 6(a) in which Ms. Manson-Winnser's name had been deleted instead of Mr. Goins'. This revised Interrogatory had no effect whatsoever, however, because it was not verified by Ionics. Instead, Ms. Seger caught the error when the revised answer was sent to her for verification. Therefore, I served a corrected revised answer to Plaintiff's Interrogatory 6(a), reflecting that the persons who "played any role whatsoever in this decision to terminate Plaintiff" included David McKinley, Director of Operations, Julie Seger, Human Resources Director, and Marianne Manson-Winnser's, Director of Human Resources, Ionics, Inc.

FURTHER AFFIANT SAYETH NAUGHT.


Jan E. Hensel

Sworn to and subscribed in my presence this 24 day of January, 2003.


NOTARY PUBLIC



JULIE M. YOUNG
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Section 147.03 F.O.C.